

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION
No. 1:19-cv-00808-LCB-JLW

ROSETTA SWINNEY, an)
individual and legal guardian)
and next friend to)
J.S., a minor,)
Plaintiff,)
v.)
FRONTIER AIRLINES, INC., et)
al.,)
Defendants.)

PETITIONER Rosetta Swinney respectfully presents:

1. J.S. is a minor.
2. J.S. is the daughter of Rosetta Swinney. Rosetta Swinney has custody of J.S.
3. J.S. and Rosetta Swinney both have a cause of action against the above-named defendant on which a suit has been brought in this court.
4. The J.S. has no guardian of her estate.
5. Rosetta Swinney is the natural and legal guardian of J.S.
6. Rosetta Swinney is willing to serve as guardian ad litem of J.S. and is fully competent to understand and protect the rights of J.S. and to have no interest adverse to that of the J.S.

7. Petitioner has contracted with Harry M. Daniels of Daniels & James, LLC, with an office located at 233 Peachtree St. NE Ste. 1200 Atlanta, GA 30303 and Julian M. Hall of the Law Office of Julian M. Hall, with an office located at 817 N. Mangum Street Durham, NC 27701 to prosecute the cause of action for the J.S. and Rosetta Swinney.

WHEREFORE, petitioner prays that she can be appointed as guardian ad litem for J.S. to prosecute the above-described cause of action on behalf of J.S.

DATE: February 16, 2022

/s/Harry M. Daniels
Harry M. Daniels
Georgia Bar No.:
234158

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VERIFICATION

I, Rosetta Swinney, am the biological mother and legal guardian of the J.S. in the above-entitled proceeding. I have read the foregoing petition and know the contents thereof. Said petition is true of my own knowledge, except as to those matters which are presented on an information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of North Carolina that the foregoing is true and correct.

DATE: February 16, 2022

/s/ Rosetta Swinney
Rosetta Swinney

CONSENT OF APPOINTMENT

I hereby consent to act as guardian ad litem for the minor J.S.

/s/ Rosetta Swinney
Rosetta Swinney

CERTIFICATE OF SERVICE

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Respectfully submitted this 16th day of February 2022.

/s/ Harry M. Daniels
Harry M. Daniels